

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MAX A. RADY,

Plaintiff,

v.

THE BOSTON CONSULTING GROUP, INC.  
and De BEERS UK LIMITED,

Defendants.

Case No.: 1:20-cv-02285 (ALC)

Judge Andrew L. Carter, Jr.

**DECLARATION OF JOSHUA D. CALABRO IN SUPPORT OF DEFENDANT DE  
BEERS UK LIMITED'S REPLY IN SUPPORT OF ITS  
RULE 12(B)(6) MOTION TO DISMISS**

I, Josh Calabro, hereby declare as follows:

1. I am an attorney at the law firm of Venable LLP, and I am admitted to practice in the United States District Court for the Southern District of New York. I am an attorney of record for Defendant De Beers UK Limited (“De Beers”) in this matter, and I submit this declaration in support of De Beers’s reply in support of its Rule 12(b)(6) motion to dismiss. The facts contained in this declaration are based upon my personal knowledge.
2. Attached as Exhibit G is a true and correct copy of Moinet, A., et al., *Blockchain based trust & authentication for decentralized sensor networks*, arXiv:1706.01730v1 [cs.CR] 6 Jun. 2017.
3. Attached as Exhibit H is a true and correct copy of excerpts from the Wayback Machine’s December 2017 capture of [https://en.bitcoin.it/wiki/Full\\_node](https://en.bitcoin.it/wiki/Full_node) (last accessed November 9, 2020).

4. I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief.

Dated: November 16, 2020

By: /s/Joshua D. Calabro  
Joshua D. Calabro

**CERTIFICATE OF SERVICE**

I hereby certify that on November 16, 2020, a copy of the foregoing will be served on counsel of record for all parties via ECF.

/s/ Joshua D. Calabro  
Joshua D. Calabro